

Exhibit “C”

Artis Ellis

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

ARTIS ELLIS	:	
Plaintiff,	:	
vs.	:	
EDUCATIONAL COMMISSION	:	C. A. No.
FOR FOREIGN MEDICAL	:	4:14-cv-02126
GRADUATES,	:	
Defendant.	:	

VIDEOTAPED DEPOSITION OF ARTIS ELLIS

Called as a witness by the Defendant, taken before Peggy Ann Antone, a Certified Shorthand Reporter in and for the State of Texas, on May 11, 2016, beginning at 9:51 a.m., at the offices of Kennard Richard P.C., 2603 Augusta Drive, Suite 1450, Houston, Texas, pursuant to the Federal Rules of Civil Procedure.

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1	Q. Do you have any -- have you come across any	1	A. I'm sorry?
2	writings that you haven't given to your lawyer yet?	2	Q. Betty LeHew was the same human resources person
3	A. I'm not sure.	3	that still worked at ECFMG throughout your employment
4	Q. So you think you may have come across writings?	4	correct?
5	A. That I have not given to my lawyers?	5	A. Yes.
6	Q. Correct.	6	Q. And this Exhibit Number 2, it appears you
7	A. No.	7	applied for the assistant manager for the Houston center
8	Q. Okay. So -- so you don't -- you're not	8	location?
9	aware -- as you sit here, you're not aware of any -- any	9	A. Yes.
10	writings that would relate to this case that you have	10	Q. And -- and you obtained that position?
11	not given to your lawyer yet.	11	A. Yes.
12	A. Not at this time.	12	Q. And did you -- do you remember what month you
13	Q. Okay. Okay. And if you do find any, you'll be	13	started in that position?
14	sure to give them to your lawyer so that he can give	14	A. I believe April.
15	them to me?	15	Q. April of 2005?
16	A. Absolutely. Yes.	16	A. Yes.
17	Q. Thank you.	17	Q. And who was your supervisor?
18	A. Erin, this would be a good time to take a	18	A. John Repasch.
19	break.	19	Q. And was he the center manager?
20	Q. You need a break now?	20	A. Yes.
21	A. Yes.	21	Q. And did you interview with Mr. Repasch for that
22	Q. Sure.	22	position?
23	A. Thank you.	23	A. I originally interviewed with Betty LeHew.
24	THE VIDEOGRAPHER: Time is approximately	24	Q. Okay.
25	10:22. We're off the record.	25	A. And then John Repasch.
	35		37
1	(Recess taken from 10:22 a.m. to 10:34	1	Q. And was Mr. Repasch the center manager until
2	a.m.)	2	the time that you were promoted to center manager?
3	THE VIDEOGRAPHER: Time is approximately	3	A. Yes.
4	10:34. We're back on the record.	4	(Exb. No. 3 was marked.)
5	Q. (BY MS. O'DRISCOLL) Ms. Ellis, I'm going to	5	Q. (BY MS. O'DRISCOLL) I hand you Exhibit 3.
6	hand you what's been marked as Exhibit 2.	6	This is ECFMG/Ellis 124, 125, and 126.
7	(Exb. No. 2 was marked.)	7	If you turn to the second page --
8	Q. (BY MS. O'DRISCOLL) This is ECFMG/Ellis 120	8	MR. KENNARD: I've got to step out for a
9	through 121.	9	second. You can continue.
10	Do you recognize this document?	10	MS. O'DRISCOLL: Do you want us to pause?
11	A. Yes.	11	MR. KENNARD: No.
12	Q. And what is that document?	12	Q. (BY MS. O'DRISCOLL) If you turn to the second
13	A. My résumé.	13	page, is -- are these the written references that you
14	Q. And is this the résumé you submitted to ECFMG	14	filled out on the job application for ECFMG?
15	when you were applying for a job there?	15	A. On the second page?
16	If you looked at the second page, it might	16	Q. Yes, ma'am.
17	help you refresh your memory.	17	A. I don't see where it says references.
18	A. Yes.	18	Q. Well, I'm sorry, work experience. I apologize.
19	Q. And you recall when you applied for that job	19	A. Yes.
20	that you submitted a cover letter to -- to human	20	Q. Okay. And I just wanted to briefly touch on
21	resources, Betty LeHew?	21	where you worked prior to the time that you applied at
22	A. Yes.	22	ECFMG.
23	Q. And Betty LeHew was the same human resources	23	I see Harris Counseling Services from March
24	person that still worked for ECFMG throughout --	24	2004 to present, to March 2005, when you were applying;
25	throughout your employment; correct?	25	is that correct?

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1	second, I have a" 25 "year old stepdaughter and a 40	1	associate myself with that.
2	year old wife... do the math. And like Patty, I have	2	Q. Okay. So even though the policy at ECFMG
3	always had a tremendous respect for you because you	3	was -- was not to have direct reporting relationships
4	worked hard to build yourself up while raising three	4	and hiring decisions and promoting decisions and
5	amazing children.	5	evaluations performed by folks that are related by
6	"BUT, I wish you had been straight with me	6	blood, that -- or that have similar relationships.
7	when we hired Jackie. I can't say, knowing this	7	A. I'm not --
8	information now, whether we would have hired Troi, but	8	MR. KENNARD: Hold on. I'm going to
9	we could have at least cleared either of their hiring	9	object. Assumes facts not in evidence. A compound
10	with Hite and HR."	10	question. And misstates previous testimony.
11	And Hite was the head of ECFMG at the time;	11	Q. (BY MS. O'DRISCOLL) So this would be a good
12	correct?	12	time, we'll look at the policy that ECFMG has. I'm
13	A. Not --	13	going to mark this as Exhibit 17.
14	Q. Betty Hite?	14	(Exb. No. 17 was marked.)
15	A. She wasn't the head. She was our director.	15	Q. (BY MS. O'DRISCOLL) And I know you've seen
16	Q. Was the director.	16	this policy before.
17	A. Yes.	17	This is ECFMG/Ellis 356-357. And the title
18	Q. That was who you-all reported to at the time.	18	of this document is "Employment of Relatives and
19	A. Yes.	19	Relationships in the Workplace."
20	Q. Okay. "Doing that would have eliminated any	20	Did I read that correctly?
21	appearance of conflict of interest or that you had tried	21	A. Yes.
22	to hide your relationship with them. And you have to	22	Q. And -- and this is a policy that you were
23	know from other people's perspective that's how it	23	familiar with at ECFMG; correct?
24	appears to them. I hope" that "makes sense."	24	A. Correct.
25	And then you respond to that; correct? You	25	Q. And you were aware that this policy existed
	107		109
1	respond to that e-mail on the front of the first page on	1	both while you were assistant center manager as well as
2	February 21st, 2014.	2	while you were the center manager; correct?
3	A. Yes.	3	A. That is correct.
4	Q. Okay. And in this response to -- to	4	Q. Okay. Roman numeral I for the -- states that
5	Mr. Repasch, you state, "Just for the record....I wasn't	5	the policy -- "It is the policy of ECFMG to regulate the
6	hiding anything from you, I really couldn't see the	6	working and reporting relationships of individuals who
7	problem. Now I can see your point how someone could	7	are related by blood, adoption, marriage, or domestic
8	have perceived malice intent."	8	partnership, affianced or significant other in order to
9	Did I read that correctly?	9	avoid real or perceived conflicts of interest,
10	A. I -- I think you're missing a whole lot of	10	influence, or favoritism."
11	other things, too, Erin. I also said, "You have no idea	11	And that's the conflict of interest that
12	how much shame I dealt with about" the "pregnancy." I	12	you and John were discussing on that e-mail; correct?
13	was a 18-year-old girl that went to a prom that had a	13	A. That is not.
14	one-night stand and got pregnant. I did not abort my	14	Q. It's not?
15	child. I had a baby. I was very young. And then right	15	A. No.
16	after that, I kind of grew up. I went to school, tried	16	Q. How -- how is that not?
17	to make a difference for myself. And I was also	17	A. Because I am not related to Troi Bryant by
18	explaining to that. That was John's point of view, and	18	blood, adoption, marriage, domestic partnership,
19	I said, yeah, okay, if that's what -- how other people	19	affianced, significant others, in order -- by no means
20	have seen that, hey, I can -- yeah, I can see maybe how	20	am I related to him. I am -- I am the mother of
21	their point of view could have been taken, but now I'm	21	Brittani Bryant, not Troi Bryant or Jackie Bryant.
22	over 40. My daughter, by the time Troi came there, she	22	Q. And, again, Troi Bryant was paying child
23	had already graduated with a degree. There was nothing	23	support through the attorney general's office and -- and
24	to gain. So, no, I -- I mean, I -- I still don't think	24	as Brittani's father to this day, and during the time he
25	that hiring Troi or being part of that, I'm not going to	25	worked with -- worked for ECFMG; correct?

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	1 visions for -- even when I came back, and, you know,	1 correct?	
	2 thereafter.	2 A. Yes.	
14:19	3 Q. And did -- did you -- when you mentioned the	3 Q. And -- and this is -- when you first walked in,	
	4 eye patch, did you say, "It's not going to affect my	4 did you meet with -- with Betty LeHew from HR?	
	5 job, I just need my husband to drive me to work because	5 A. No. When I first walked in, I said hello to a	
	6 I can't drive"?	6 few of the employees.	
	7 A. No.	7 Q. And then did you meet with someone?	
	8 Q. You didn't say anything like that?	8 A. Yes.	
14:19	9 A. No. I said I'm going to need accommodation. I	9 Q. Did you meet --	
	10 just don't know what they are yet. May be, you know, a	10 A. I said hello.	
	11 screen, it may be the lighting for the computers, a	11 Q. Did you meet alone with Ms. LeHew?	
	12 different font. I'm not sure.	12 A. I wouldn't say meet. I said, "Hello." And	
	13 Q. And -- and did you ever, in fact, ask for a	13 when I walked in my office, Betty LeHew was in my	
14:19	14 specific accommodation when you went back?	14 office, and then we exchanged. Betty told me that --	
	15 A. Yes.	15 because I had told Betty and Sharon and people in HR	
	16 Q. What was --	16 that I could not be under stress. My doctor said that,	
	17 A. Not specific, because I -- I wasn't given that	17 the same thing, that he could not afford to lose me on	
14:20	18 opportunity to say what the specific accommodations	18 this side of the table and I could not be up under	
	19 were. I just said, "I know I'm going to need some	19 that -- up under stress. And Betty said, "Well, your	
	20 accommodation."	20 directors are here, and they need to talk to you about	
	21 Q. Did -- but you didn't say a -- what a specific	21 some concerns they have."	
	22 accommodation was that you needed?	22 And I said, "Was this one of those meetings	
	23 A. I said --	23 we should have at the hotel?"	
14:20	24 MR. KENNARD: Objection to the extent that	24 And she said, "Well, do you think we need	
	25 it calls for a legal conclusion.	25 to go to the hotel?"	
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	1 Q. (BY MS. O'DRISCOLL) Did you -- did you ask for	1 I said, "I don't know what the meeting is	
	2 anything specific that you needed when you returned?	2 about."	
14:20	3 A. I just said I needed possibly a computer	3 And then she -- they -- they walked in,	
	4 screen, that it needs to be larger, those things.	4 Betty and -- I'm sorry -- Nancy and Chris.	
	5 Q. You did actually say that?	5 Q. Okay. And before they walked in, though, did	
	6 MR. KENNARD: Hold on. Hold on. Let's let	6 Betty tell you that -- that ECFMG had received the full	
	7 her finish answer -- hold on. Let's let her finish	7 release -- your full release to return to work?	
	8 answering the question, then you're free to ask her	8 A. I don't recall her saying that to me.	
14:20	9 another question as it pertains to anything that she	9 Q. Did she say, "I want to make sure that you're	
	10 responded with. But I would really ask that we allow	10 fine to proceed. We're about to have a discussion. I	
	11 her, before we jump in and cut her off, to let her	11 want to make sure that you're feeling good and that	
	12 finish answering the question.	12 you're fine to proceed with this meeting today."	
	13 So you may continue, with your response.	13 Do you remember that?	
14:20	14 Were you done?	14 A. She said something similar to that, yes.	
	15 A. Computer screen may need to be larger, the	15 Q. Okay. And then did you assure her, yes, let's	
	16 lighting, chair. I didn't know exactly which one	16 go forward with the meeting?	
	17 because I had not been at work. I walked into my	17 A. I did.	
	18 office -- to the office, said hello to a few of the	18 Q. Okay. And then you said that you also met with	
14:20	19 employees, and then I was ambushed by these special	19 was it Nancy Ambrose?	
	20 needs or concerns.	20 A. It was Nancy Ambrose and Chris Paul and Betty	
	21 Q. (BY MS. O'DRISCOLL) Okay. And let's talk	21 LeHew.	
	22 about -- let's talk about your -- your return.	22 Q. Okay. And where were -- where were you-all at	
	23 On October 22nd --	23 ECFMG that day?	
14:20	24 A. Yes.	24 A. We were in my office.	
	25 Q. -- 2012, that's the day we're talking about;	25 Q. Okay. So before we -- before we turn to that,	

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	1 let me just -- there's one document I will mark as	1	those half days.
	2 Exhibit 22nd.	2	Q. So for the -- for the half days, were you
	3 (Exb. No. 22 was marked.)	3	wanting to use sick time and not FMLA?
:21	4 Q. (BY MS. O'DRISCOLL) I'm sorry. 22, and that's	4	A. Correct.
	5 ECFMG/Ellis 398 through 399.	5	Q. Okay. So in using -- in using the sick time,
	6 And just let me know once you've finished	6	you didn't believe that you needed to fill out any
	7 reviewing this document.	7	additional paperwork?
	8 A. Yes.	8	A. Correct.
:22	9 Q. So this is a letter dated October 19th, 2012,	9	Q. Okay. And when you returned on October 22nd,
	10 addressed to you; correct?	10	2012, you were starting to tell me that you met with
	11 A. Yes.	11	Ms. Ambrose as well as Chris Paul and that Ms. LeHew --
	12 Q. From ECFMG?	12	that they were in your office on that day; correct?
:22	13 Sharon Trowell-Roman, that was the HR	13	A. They weren't in my office. I met with Betty --
	14 manager that you'd been working with on your FMLA leave;	14	I met with the -- I walked down the hallway, saw a few
	15 correct?	15	employees, and then Betty was in my office, and then
	16 A. Yes.	16	Nancy Ambrose and Chris Paul walked in shortly
	17 Q. And in this letter, she tells you that -- that	17	thereafter.
	18 they received the fit for duty form completed by your	18	Q. Okay. Okay. And what did they say when --
:23	19 physician releasing you to return to work at full	19	when they walked in?
	20 capacity as of October 22nd, 2012.	20	A. We greeted each other, said hello, with some
	21 Did I read that correctly?	21	pleasantries, and then they ambushed with firing -- they
	22 A. Yes.	22	knew I wasn't supposed to be up under stress. They
:23	23 Q. And then the second paragraph, it says, she	23	started ambushing with firing questioning and gave me
	24 reminds -- she tells you about the leave, that "You	24	a -- they didn't even give me a list of concerns. They
	25 previously used FMLA leave beginning January 18th, 2012,	25	just started with a whole list of things that -- it was
	155		157
	1 until January 30th, 2012, to care for your spouse. You	1	brought to my attention, employees stated, management --
	2 currently have four weeks and six days of FMLA remaining	2	manage -- management did this, and none of -- a lot of
:23	3 in this 12 month period. If you have the need for	3	it I had never even heard before.
	4 additional FMLA" leave -- "FMLA time, please contact	4	Q. Do you -- do you remember anything specific?
	5 me."	5	Does anything specific come to mind that -- that they
	6 Did I read that correctly?	6	addressed with you that day?
	7 A. That is correct.	7	A. It was brought to my attention about Troi
:23	8 Q. Okay. And did you ever contact Ms. Sharon	8	Bryant. It was brought to my attention about some
	9 Trowell-Roman for any additional leave after this	9	robes, plates.
	10 letter?	10	Q. I'm sorry. What did you say, some robes and
	11 A. I did. I did. I talked --	11	plates?
	12 Q. When -- when did you do that?	12	A. Robes.
:28	13 A. I contacted her before I went back to work to	13	Q. Anything else?
	14 tell her that I was going to be going to work only for	14	A. Something about I was eating someone's food.
	15 half days for the first week.	15	Q. And did they tell you that -- that these were
	16 Q. Did you provide any documentation at all from	16	complaints that they had received from other employees?
	17 your physician --	17	A. Yes, but they never told me who the employees
	18 A. I --	18	were. I had never heard that before or the complaints
:28	19 Q. Wait. Let me finish.	19	before. Never was given a corrective written action
	20 MR. KENNARD: Let her finish.	20	to -- to even correct the -- the action. Never even
	21 Q. (BY MS. O'DRISCOLL) Did you provide any	21	seen a memo like that before. And then I brought -- you
	22 documentation from your physician or any additional FMLA	22	know, we stopped it, and brought it to Betty LeHew's
	23 paperwork to request half days?	23	attention that a list of people that had called me, gave
:26	24 A. I don't recall -- I don't believe I did. I	24	her specific names that she needed to investigate and
	25 told her that I would be using some of my sick time for	25	talk to and with part time and full time that during my

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	<p>1 whole FMLA time, being off work, how these employees</p> <p>2 every day were calling my home till my husband had to</p> <p>3 finally say, "My wife is recovering," to please stop</p> <p>4 calling my home.</p> <p>14:29 5 Q. Did -- you said you gave a list of names to</p> <p>6 Betty to investigate?</p> <p>7 A. Yes.</p> <p>8 Q. What did you want her to investigate?</p> <p>9 A. Because the -- the employees were saying that</p> <p>14:29 10 Chris was undermining everything that I was doing, so I</p> <p>11 wanted her to talk to all of the full-time employees</p> <p>12 that were calling my home during my leave of absence,</p> <p>13 and saying these things that was going on, the part-time</p> <p>14 employees, as well, that were saying these things. And,</p> <p>14:29 15 I mean, I couldn't even refute all the things that were</p> <p>16 said. I wasn't given the opportunity to refute.</p> <p>17 I was told by Betty LeHew that -- you know,</p> <p>18 I said, "Well, Betty, I can go back on leave."</p> <p>19 And she said, "No. You should take -- off</p> <p>14:28 20 the record, you should take the personal leave of</p> <p>21 absence."</p> <p>22 And I said, "Okay," because I didn't know</p> <p>23 any -- I didn't -- I didn't know. I didn't know. So I</p> <p>24 said, "Okay." Called my husband. She told me to give</p> <p>14:28 25 her my cell phone. I gave her my cell phone, called my</p>	<p>1 Bryant and --</p> <p>2 A. That was not the first thing I mentioned.</p> <p>3 Q. I wrote down Troi Bryant, robes and plates, and</p> <p>4 eating someone's food.</p> <p>5 Did I miss one?</p> <p>6 A. There was a list. We can go back on -- the</p> <p>7 court reporter to see, actually, what I said.</p> <p>8 MS. O'DRISCOLL: Can we go back to what she</p> <p>9 responded had been --</p> <p>10 THE REPORTER: QUESTION: "Do you -- do you</p> <p>11 remember anything specific? Does anything specific come</p> <p>12 to mind that -- that they addressed with you that day?"</p> <p>13 ANSWER: It was brought to my attention</p> <p>14 about Troi Bryant. It was brought to my attention about</p> <p>15 some robes, plates.</p> <p>16 MS. O'DRISCOLL: Thank you.</p> <p>17 Q. (BY MS. O'DRISCOLL) So I wanted to get a</p> <p>18 little more detail, when you say they brought to your</p> <p>19 attention about Troi Bryant, are you referring to fact</p> <p>20 that he's your daughter's father?</p> <p>21 A. Yes.</p> <p>22 Q. And did they reference the relationship policy</p> <p>23 at that time?</p> <p>24 A. No, I don't recall it.</p> <p>25 Q. Okay. Do you remember, did they reference</p>
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	<p>1 husband to come pick me up. She walked me outside, and</p> <p>2 that was it until I heard back from -- Betty left a</p> <p>3 message on my voice mail to meet her at a hotel, I did,</p> <p>4 gave them my things, and then we started corresponding</p> <p>14:28 5 on how to get my personal belongings.</p> <p>6 Q. Okay. Let's -- let's back up a little bit.</p> <p>7 On -- when you were having this discussion with</p> <p>8 Ms. Ambrose, Mr. Paul, and Ms. LeHew, you said they gave</p> <p>9 you a list of concerns.</p> <p>14:28 10 A. I did not say they gave me a list of concerns.</p> <p>11 Q. They -- they -- they listed a list of concerns.</p> <p>12 A. Yes.</p> <p>13 Q. You eventually were given a list; correct?</p> <p>14 A. I had to request a list.</p> <p>14:28 15 Q. Okay. And you were given that list?</p> <p>16 A. Yes.</p> <p>17 Q. Okay.</p> <p>18 A. After I requested that list.</p> <p>19 Q. Okay. And did you receive that list that day</p> <p>14:28 20 or some day after that?</p> <p>21 A. That day.</p> <p>22 Q. Okay. And did you -- that day, on October</p> <p>23 22nd, 2012 -- I was making a list of the items that</p> <p>24 you -- that I noted that you mentioned.</p> <p>14:29 25 The first thing you mentioned was Troi</p>	<p>1 that -- that they believed that there was some sort of a</p> <p>2 policy violation related to Troi Bryant working there,</p> <p>3 having been your daughter's father?</p> <p>4 A. Betty did bring that to my attention, and I</p> <p>5 said, "Betty, Troi hasn't worked here in over a year,</p> <p>6 and -- why is that a difference when you have David and</p> <p>7 Heidi working together." And Betty has her stepdaughter</p> <p>8 and it clearly states about stepdaughter, Troi is not</p> <p>9 related to me.</p> <p>10 Q. Did -- did Betty or -- or Ms. Ambrose or</p> <p>11 Mr. Paul, did anyone ask you: Is Troi Bryant your</p> <p>12 daughter's father?</p> <p>13 A. Yes.</p> <p>14 Q. And did you respond to that question?</p> <p>15 A. I -- I did, and I was trying to say that he --</p> <p>16 he is, but, I mean, we were not related.</p> <p>17 Q. Did -- did you say that that day? Was your</p> <p>18 response that day?</p> <p>19 A. I did not. I was trying to get out that he's</p> <p>20 the father, but he's not related to me in any kind of</p> <p>21 way, because as I mentioned earlier in the testimony, is</p> <p>22 that -- that was -- that was a lot of shame, and that</p> <p>23 was over 25 years ago, or longer. And that was a lot of</p> <p>24 shame that was about that, regarding that, having a</p> <p>25 child out of wedlock, and it was just a one-night stand.</p>

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1	But later that evening, I believe I called Betty or	1	Q. (BY MS. O'DRISCOLL) You can answer.
2	shortly thereafter I called her and just went ahead and	2	MR. KENNARD: You can answer if you're able
3	just said, "Betty, you know, Troi is the father of	3	to?
4	Brittani, but there is no relation or -- there's --	4	A. I recall calling Betty saying that Troi was
5	we're not relatives, though."	5	Brittani's father.
6	Q. In fact, when Betty asked you that day, on the	6	Q. (BY MS. O'DRISCOLL) Do you remember saying
7	22nd, she -- when she asked you if Troi was Brittani's	7	something to the effect of, I have to clear my
8	father, didn't you say that he -- he stepped up, that,	8	conscience?
9	no, he wasn't her father, but he -- he stepped up,	9	A. I don't recall that.
10	something to that -- something -- something to that	10	Q. Okay. Do you also remember being asked on
11	effect?	11	October 22nd about sharing your password?
12	MR. KENNARD: Objection. Calls for	12	A. Yes.
13	speculation. Assumes facts not in evidence. And	13	Q. Okay. And what -- what did -- and who said it,
14	misstates testimony.	14	and what did they say? Was it Ms. Ambrose or Mr. Paul
15	Q. (BY MS. O'DRISCOLL) I'll restate -- restate	15	or Ms. LeHew?
16	the question.	16	A. I don't remember who said -- who asked me about
17	When Betty asked you if Troi was Brittani's	17	it, but I was told that I -- I -- who I shared it with.
18	father, did you -- in that -- in that sitting, on	18	I didn't know who I had shared it with.
19	October 22nd, did you deny that Troi was Brittani's	19	Q. Were you asked if you shared your password?
20	father?	20	A. Yes. And I responded with a list of people,
21	A. Indirectly.	21	was it Flores, was it -- because I didn't know. I was
22	Q. And -- and can you give me a little more detail	22	under a lot -- I was having brain surgery. I talked to
23	on what you said?	23	a lot of people. I was under a lot of different
24	A. As I was stating earlier, I didn't just	24	medication.
25	directly say, yes, he's the -- he's her father, because	25	Q. And did you admit to sharing your password with
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1	of the shame that was related to that.	1	someone?
2	I was giving a story that, yes, but we're	2	A. After I was told that I did. And I'm not --
3	not -- there is no blood relation or I'm not -- I'm	3	I'm a fairly honest person, so I said -- if my
4	related to Brittani, but not to Troi, but -- so --	4	employer -- I worked with these people for seven years.
5	Q. Do you remember saying anything, something to	5	If they told me that I did that, then I -- I just
6	the effect of he stepped up or stepped in or something	6	believe that they had no reason to lie to me.
7	to -- of that nature?	7	Q. Did -- did you -- did you tell them that you
8	MR. KENNARD: Objection. Misleading.	8	had shared the password with a woman named Sharon?
9	Confusing. And assumes facts.	9	A. No. They told me.
10	Q. (BY MS. O'DRISCOLL) I'm just asking you if you	10	Q. They told you that that's who it was?
11	remember saying anything like that.	11	A. Yes.
12	A. I don't remember. I don't recall that.	12	Q. Okay. And for the benefit of the jury, what --
13	Q. Okay. Okay. Do you -- do you remember calling	13	what is -- what is this password? What does it do?
14	Betty either that evening or the next day and saying, "I	14	A. The -- when they told -- it certified the exam.
15	have to clean my conscience, Troi's Brittani's father?"	15	Q. Okay. And does that mean that -- what does
16	A. I --	16	that mean, "certifying the exam"?
17	Q. Clear my conscience.	17	A. It actually benefits the company. It made sure
18	MR. KENNARD: Objection. Assumes facts.	18	that the -- the examinees actually got their scores on
19	And calls for speculation.	19	time, so it benefit the company.
20	Q. (BY MS. O'DRISCOLL) Did you ever say anything	20	Q. What goes into certifying an exam? What does
21	like that to Betty --	21	that mean?
22	MR. KENNARD: Same objection.	22	A. Two buttons, that the exam happened that day,
23	Q. (BY MS. O'DRISCOLL) -- that you have to clear	23	and all the paperwork was done correctly, yes, yes.
24	your conscience?	24	Q. And when you provided your password to Sharon,
25	MR. KENNARD: Same objection.	25	was she a management-level employee?

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	<p>1 A. She was acting as the assistant manager, 2 because again, I was put in a position to be the manager 3 because the assistant manager had resigned and had left. 4 So I was the manager by myself.</p> <p>114:38 5 Q. She was the acting assistant manager. 6 A. Like unofficial, yes. 7 Q. So what does that mean, "unofficial"? 8 A. She had not -- she had not gone through HR and 9 approved, but Chris had -- I had asked Chris about her 114:40 10 being -- acting assistant center manager, so she was 11 doing things for me that -- she assisted me. 12 Q. And was she given management-level 13 responsibilities to certify exams? 14 A. No. 114:40 15 Q. And you understood that your password should 16 only be used by you; correct? 17 A. Yes. But keep in mind that I -- I was not even 18 aware that I had given my password to anyone until it 19 was brought to me that day on the 22nd.</p> <p>114:41 20 Q. Which was the first day you came back to work. 21 A. Which was the first day I came back to work. 22 Bearing that I was working while they were calling me on 23 leave. 24 Q. And when you say you were -- when you were 114:43 25 working, did you ever tell Betty LeHew or anyone with</p>	<p>1 six. 2 Q. And they were all filling in to -- to help 3 pitch in for the -- the center manager responsibilities? 4 A. Yes. 5 Q. Okay. And you said except John? 6 A. Yes. 7 Q. And what location is he located at? 8 A. Philadelphia. 9 Q. Okay. Mark this as Exhibit 23, ECFMG 358-359. 10 (Exb. No. 23 was marked.) 11 Q. (BY MS. O'DRISCOLL) If you could take a look 12 at that chart and tell me if you've seen that chart 13 before. 14 A. I don't recall this chart. 15 Q. You don't recall ever seeing this chart? 16 A. What's the name of it? 17 Q. It's -- it's the site business functions chart, 18 listing the -- the business functions and 19 responsibilities. 20 You don't recall ever seeing it? 21 A. (Witness indicated by shaking head.) 22 Q. Okay. But you knew that as center manager 23 that -- that for -- for certifying a session, you knew 24 that only center management could do that or central 25 S -- CSEC; correct?</p>
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	<p>1 human resources, "Hey, I'm getting calls from -- from 2 the center. I'm being asked to work while I'm on 3 leave"? Did you tell anybody? 4 A. Not until -- well, Betty knew because they were 14:38 5 interviewing the assistant center manager. And Chris 6 called me and said that I could come to the center and 7 sit in the room while they were interviewing assistant 8 center managers to, I guess, give some feedback or 9 something, but at -- during the interview, I couldn't 14:38 10 say anything. 11 Q. Did -- 12 A. And I was on leave during that time. 13 Q. Did you come in -- 14 A. I did not. 14:38 15 Q. -- during the interviews? 16 A. I did not. And that was a choice that I made, 17 but I was asked to. 18 Q. And who was -- who was covering center 19 manage -- your center manager responsibilities while you 14:38 20 were out on leave, in Houston? 21 A. All the center managers stepped up, with the 22 exception of John, and came to the center. 23 Q. And how many other centers are there around the 24 U.S.? 14:39 25 A. There's five other centers. Houston would be</p>	<p>1 A. CSEC is -- CSEC is the -- the -- the satellite 2 offices. 3 Q. The executive director, the director, and 4 assistant director; correct? 5 A. No. 6 Q. Well, if you look -- if you haven't seen this 7 chart before, it may not help. But on the right side 8 where it says "Central Business Functions with People or 9 Title," in the third group down on the right, "Central" 10 SEC -- "CSEC," says "Executive Director," "Director," 11 and "Assistant Director." 12 Is that not accurate? 13 A. It says that about what, though? What are you 14 referencing? 15 Q. So in the very bottom, I'm just talking about 16 who has the ability to certify a session, certify a 17 test. And the very bottom in the left-hand corner, 18 "Session certification." 19 Do you see that? 20 A. Uh-huh. Yes. 21 Q. And then if you go over to the right, it 22 says -- there's an X, which if you follow that up, goes 23 to "Center management." 24 So that would that be you -- correct? -- 25 for session certification?</p>

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	<p>1 you asked for a list, you were given the list, and then</p> <p>2 you were told that you were being put on administrative</p> <p>3 leave while these items were investigated; correct?</p> <p>4 A. No. I don't remember saying these items going</p> <p>5 to be investigated. I remember asking Betty if she can</p> <p>6 investigate the people that had been calling me,</p> <p>7 full-time and part-time staff, about some of the</p> <p>8 concerns that was going on with Houston, not about this</p> <p>9 list.</p> <p>10 Q. You don't remember Ms. Ambrose saying, "I'm</p> <p>11 going to look into these issues. We're going to put you</p> <p>12 an administrative leave. Betty said I'm going to look</p> <p>13 into your concerns and -- and look into any employees</p> <p>14 that called you while they were on leave," but,</p> <p>15 separately, Ms. Ambrose said, "I'm going to look into</p> <p>16 these issues"?</p> <p>17 A. I would have gone --</p> <p>18 MR. KENNARD: Hold on. Hold on.</p> <p>19 Objection. Compound question. Assumes facts. And</p> <p>20 calls for speculation.</p> <p>21 Q. (BY MS. O'DRISCOLL) Did Ms. Ambrose tell you</p> <p>22 that she was going to look into these issues while you</p> <p>23 were placed on administrative leave?</p> <p>24 A. I don't recall that. I would have thought</p> <p>25 before Betty would have allowed them to bring this to</p>	<p>1 Ms. Ambrose -- well, you had the conversation on the</p> <p>2 22nd, and then you also had additional conversation with</p> <p>3 Betty when you called Philadelphia; correct?</p> <p>4 A. But it was not a very intense, long</p> <p>5 conversation with Betty.</p> <p>6 Q. You didn't talk about multiple bullets on this</p> <p>7 list?</p> <p>8 A. No, I talked about probably two or three.</p> <p>9 Q. And what two or three did you talk about with</p> <p>10 Betty?</p> <p>11 A. I know I talked to her about the food, and I</p> <p>12 know I -- I believe I talked to her about the robes.</p> <p>13 Q. And you talked to her about Mr. Bryant being</p> <p>14 Brittani's father.</p> <p>15 A. I did talk to her about Mr. Bryant being</p> <p>16 Brittani's father.</p> <p>17 Q. And do you remember talking about any of the</p> <p>18 other bullet points?</p> <p>19 A. I don't recall.</p> <p>20 Q. When you met with Ms. Ambrose and Mr. Paul and</p> <p>21 Ms. LeHew on the 22nd, they didn't finish going through</p> <p>22 all the bullets yet in that setting; correct?</p> <p>23 A. Correct.</p> <p>24 Q. And did they tell you, "We're going to consider</p> <p>25 your comments on what we've discussed thus far, we're</p>
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	<p>1 me, she would have already looked into these issues.</p> <p>2 Q. So you don't recall being told that this was</p> <p>3 being investigated?</p> <p>4 A. If this was brought to me, I would have thought</p> <p>5 that this would already have been investigated, that --</p> <p>6 that this was brought to whoever this was brought to.</p> <p>7 And Betty had already flown to Houston, so she had</p> <p>8 already talked to someone. So I would have thought that</p> <p>9 they had already investigated this and this was factual</p> <p>10 to them, and -- that this was factual to them so Betty</p> <p>11 would not have needed to tell me that she was going to</p> <p>12 investigate this, because they would have already looked</p> <p>13 into this.</p> <p>14 Q. But they hadn't gotten your responses yet;</p> <p>15 correct?</p> <p>16 A. No, they had not gotten my responses yet.</p> <p>17 Q. And that was -- and that was the purpose of</p> <p>18 meeting with you on the 22nd and putting you on</p> <p>19 administrative leave so that they could look into your</p> <p>20 responses; correct?</p> <p>21 A. They hadn't -- they did not get my responses to</p> <p>22 all of these bullet points.</p> <p>23 Q. But they did to most of them, didn't they?</p> <p>24 A. I can't say to most.</p> <p>25 Q. Well, didn't you have a conversation with</p>	<p>1 going to look into it further, and we're going to put</p> <p>2 you on administrative leave"?</p> <p>3 A. No. Betty said -- off the record, Betty --</p> <p>4 Q. Before -- before -- before -- okay. You're</p> <p>5 talking about something. And if you could just walk me</p> <p>6 through, while all -- Ms. Ambrose, Mr. Paul, Betty and</p> <p>7 you, while you guys were all in that same room together.</p> <p>8 A. Yes.</p> <p>9 Q. So first you spoke with Betty, and then --</p> <p>10 alone. And then you went into the room, and there were</p> <p>11 the -- and it was the four of you; correct?</p> <p>12 A. Correct.</p> <p>13 Q. And then at the end of that conversation with</p> <p>14 the four of you, didn't someone in that room -- and I</p> <p>15 don't know if it was Mr. Paul or Mr. Ambrose --</p> <p>16 Ms. Ambrose or Ms. LeHew -- but didn't someone in that</p> <p>17 room say, "We're going to put you on administrative</p> <p>18 leave, paid administrative leave while we look into</p> <p>19 these issues"?</p> <p>20 A. Chris Paul said that you're going to go on</p> <p>21 leave. I requested to go on family -- back on FMLA, and</p> <p>22 asked for a copy of this. And then Betty LeHew -- Chris</p> <p>23 told me, no, I could not get a copy of this. Betty</p> <p>24 said, "Yes, she can." And then Betty asked them to step</p> <p>25 out, Betty -- Nancy and Chris to step out of the room.</p>

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<p style="text-align: right;">202</p> <p>1 Then Betty and I talked and --</p> <p>2 Q. And what -- what did -- what did y'all talk</p> <p>3 about when you and Betty talked?</p> <p>4 A. When I told Betty that I need to go back on</p> <p>5 leave. And she then said, "Well, off the record, you</p> <p>6 can go on leave -- personal leave of absence."</p> <p>7 And she said that -- I said, "Betty, you</p> <p>8 know me."</p> <p>9 And she said, "I do." And she said that --</p> <p>10 I said, "They have -- staff have been</p> <p>11 calling me from -- at home while I was on leave and I</p> <p>12 was sick and they were calling me about all this stuff</p> <p>13 that's going on in the center and then I would come into</p> <p>14 work and this is what I get."</p> <p>15 And she said, "Well, you know" --</p> <p>16 I said, "This is a list of people." I</p> <p>17 told -- I gave her a list of some names of people that</p> <p>18 she needed to talk to. And as I stated earlier, that</p> <p>19 she asked for my cell phone, and I called my husband to</p> <p>20 come and pick me up.</p> <p>21 Q. And did you specifically say, "I need to go out</p> <p>22 on FMLA leave"?</p> <p>23 A. I specifically told her I need -- I wanted to</p> <p>24 go back on FMLA leave.</p> <p>25 Q. And --</p>	<p style="text-align: right;">204</p> <p>1 A. At that time, I was not -- I was not working.</p> <p>2 I was on administrative leave, so --</p> <p>3 Q. You were on paid administrative leave.</p> <p>4 A. Paid administrative leave, as Betty had</p> <p>5 instructed me to go.</p> <p>6 Q. But did you at any time between October 22nd</p> <p>7 and November 1st ever request to go back out on FMLA and</p> <p>8 tell ECFMG, "I have a doctor's note. I have a serious</p> <p>9 medical condition, or some other qualifying need, I need</p> <p>10 to go back out on FMLA"? Did you ever say anything like</p> <p>11 that?</p> <p>12 MR. KENNARD: Objections. It assumes facts</p> <p>13 and calls for a legal conclusion.</p> <p>14 Q. (BY MS. O'DRISCOLL) Did you ever ask FMLA --</p> <p>15 did you ever ask to go back out on FMLA for a serious</p> <p>16 medical condition?</p> <p>17 A. No, because I was on personal leave of absence.</p> <p>18 Q. And did --</p> <p>19 A. Administrative leave of absence. I'm sorry.</p> <p>20 Q. And -- and you never called Sharon Roman</p> <p>21 Trowell [sic] up in Philadelphia to request FMLA</p> <p>22 paperwork to fill out; correct?</p> <p>23 A. Because I was on administrative leave, I was</p> <p>24 waiting for them to call me to let me know what was the</p> <p>25 outcome of Betty's investigation, and I -- I knew that I</p>
<p style="text-align: right;">203</p> <p>1 A. In that group.</p> <p>2 Q. You said that your -- you said it in the group,</p> <p>3 not just to Betty?</p> <p>4 A. I said it in the group, and I said it to Betty.</p> <p>5 And then that's when she said, "Off the record, you need</p> <p>6 to go back -- you know, on personal leave of absence."</p> <p>7 Q. What --</p> <p>8 A. Because I knew I can go back on leave. I had</p> <p>9 leave time from Sharon's letter.</p> <p>10 Q. And -- and how did you -- you had just received</p> <p>11 your fitness for duty to return for work with a clear,</p> <p>12 full release; correct?</p> <p>13 A. Correct.</p> <p>14 Q. How did you think that you could go -- that you</p> <p>15 qualified to go back out on leave?</p> <p>16 A. Because I knew that Dr. Tom said, "I cannot</p> <p>17 afford to lose you on this side of the table," and that</p> <p>18 that was still some concerns with my neurologist as well</p> <p>19 as the endocrinologist.</p> <p>20 Q. So did you at any time -- either on the October</p> <p>21 22nd or anytime prior to your termination on November</p> <p>22 1st, did you ever call any of your physicians and get</p> <p>23 some sort of a modified fitness for duty or -- or some</p> <p>24 sort of a modification that you could turn in to ECFMG</p> <p>25 to request leave, to request FMLA leave?</p>	<p style="text-align: right;">205</p> <p>1 was probably going to be terminated.</p> <p>2 Q. So the answer is to my -- and could you read</p> <p>3 back the question that I asked?</p> <p>4 THE REPORTER: QUESTION: "And -- and you</p> <p>5 never called Sharon Roman Trowell up in Philadelphia to</p> <p>6 request FMLA paperwork to fill out; correct?"</p> <p>7 MR. KENNARD: Objection. Asked and</p> <p>8 answered.</p> <p>9 Q. (BY MS. O'DRISCOLL) Is that statement correct,</p> <p>10 that you never contacted Sharon Trowell for FMLA</p> <p>11 paperwork?</p> <p>12 MR. KENNARD: Same objection.</p> <p>13 Q. (BY MS. O'DRISCOLL) Is that correct?</p> <p>14 A. I never called Sharon while I was on</p> <p>15 administrative leave to ask for additional FMLA</p> <p>16 paperwork.</p> <p>17 Q. And you never contacted any of your doctors for</p> <p>18 a doctor's note to go back out on FMLA leave, did you?</p> <p>19 A. I was not physically at work. I was on paid</p> <p>20 administrative leave, so I was at home. I wasn't</p> <p>21 physically in the office.</p> <p>22 Q. So the answer to that question is no, you never</p> <p>23 contacted doctor -- doctors for a doctor's note to go</p> <p>24 back out on leave; correct?</p> <p>25 MR. KENNARD: Objection. Confusing.</p>

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16:29	<p>1 didn't think that would probably be the most safest and</p> <p>2 appropriate thing for me. So at that point, I think I</p> <p>3 started waking up, saying, "No, this is work-related. I</p> <p>4 should not be going to the center, nor should my</p> <p>5 director be calling me to come in to be doing work.</p> <p>6 That's work related, and I should not be there."</p> <p>7 Q. And you said, "No, I'm not coming in"; correct?</p> <p>8 A. No. I just did not show.</p> <p>9 Q. Okay. And were you ever written up or</p>	<p>1 Q. Was it before you went out on leave?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. When you said that Mr. Paul was</p> <p>4 retaliating against you, what does that mean to you?</p> <p>5 A. That means that anytime I would bring something</p> <p>6 to him, he then will just come full force and would say</p> <p>7 things negative to my staff or to -- if I brought</p> <p>8 anything to his attention, he would say negative things</p> <p>9 to my staff or to other managers, to my assistant</p> <p>10 manager.</p> <p>11 Q. And what -- what was he saying to staff and</p> <p>12 managers about you?</p> <p>13 A. Some of the things I just mentioned to you.</p> <p>14 Q. Well, I -- I was taking notes while you were</p> <p>15 saying them, and you said called names and using</p> <p>16 inappropriate language, but -- and specifically I have</p> <p>17 that he called you a witch.</p> <p>18 Is there anything else specific that you</p> <p>19 can -- that you can recall that he --</p> <p>20 A. I know he said that I wasn't a good manager,</p> <p>21 because I remember I had called -- I had text him and</p> <p>22 told him I -- and that's how we used to -- we could text</p> <p>23 him and say that we weren't going to be in the office if</p> <p>24 we needed to take a sick day. And I text him, and he</p> <p>25 came into Houston, pulled in unexpectedly, and I texted</p>	
16:29	<p>10 reprimanded or ever given a verbal reprimand for not</p> <p>11 coming in for that interview?</p> <p>12 A. I was never given a verbal reprimand or written</p> <p>13 corrective action for anything during my duration at</p> <p>14 ECFMG. I think one time, and I didn't even know it was</p>	<p>10 manager.</p> <p>11 Q. And what -- what was he saying to staff and</p> <p>12 managers about you?</p> <p>13 A. Some of the things I just mentioned to you.</p> <p>14 Q. Well, I -- I was taking notes while you were</p> <p>15 saying them, and you said called names and using</p> <p>16 inappropriate language, but -- and specifically I have</p> <p>17 that he called you a witch.</p> <p>18 Is there anything else specific that you</p> <p>19 can -- that you can recall that he --</p> <p>20 A. I know he said that I wasn't a good manager,</p> <p>21 because I remember I had called -- I had text him and</p> <p>22 told him I -- and that's how we used to -- we could text</p> <p>23 him and say that we weren't going to be in the office if</p> <p>24 we needed to take a sick day. And I text him, and he</p> <p>25 came into Houston, pulled in unexpectedly, and I texted</p>	
16:29	<p>15 a corrective -- written -- a corrective action. I had</p> <p>16 to call Betty and ask her about it. And I was making</p> <p>17 several complaints to HR about my director at that</p> <p>18 particular time.</p> <p>19 Q. About Mr. Paul?</p>	<p>15 saying them, and you said called names and using</p> <p>16 inappropriate language, but -- and specifically I have</p> <p>17 that he called you a witch.</p> <p>18 Is there anything else specific that you</p> <p>19 can -- that you can recall that he --</p> <p>20 A. I know he said that I wasn't a good manager,</p> <p>21 because I remember I had called -- I had text him and</p> <p>22 told him I -- and that's how we used to -- we could text</p> <p>23 him and say that we weren't going to be in the office if</p> <p>24 we needed to take a sick day. And I text him, and he</p> <p>25 came into Houston, pulled in unexpectedly, and I texted</p>	
16:29	<p>20 A. Yes.</p> <p>21 Q. And when you say "at that time," is this -- is</p> <p>22 this prior to the time that you went out on leave in the</p> <p>23 fall?</p>	<p>20 A. I know he said that I wasn't a good manager,</p> <p>21 because I remember I had called -- I had text him and</p> <p>22 told him I -- and that's how we used to -- we could text</p> <p>23 him and say that we weren't going to be in the office if</p> <p>24 we needed to take a sick day. And I text him, and he</p> <p>25 came into Houston, pulled in unexpectedly, and I texted</p>	
16:30	<p>24 A. This was prior -- this was prior to the time I</p> <p>25 went out on leave.</p>	<p>24 we needed to take a sick day. And I text him, and he</p> <p>25 came into Houston, pulled in unexpectedly, and I texted</p>	
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16:30	<p>1 Q. Okay. And what type of complaints did you make</p> <p>2 about Mr. Paul?</p> <p>3 A. I complained that he -- he was retaliating</p> <p>4 against me, he was -- he called me names, or out of my</p> <p>5 name. He -- he subjected me to a lot of things that</p> <p>6 other managers did not have to talk about.</p> <p>7 Q. Like what? Like what?</p> <p>8 A. Oh, he used inappropriate language.</p> <p>9 Q. Like what?</p>	<p>1 him and told him that I was going to be out. And he</p> <p>2 said that I wasn't a good manager to David, and David</p> <p>3 had e-mailed me.</p> <p>4 He -- it was several things. He told Brent</p> <p>5 a couple of things. It was inappropriate. And when I</p> <p>6 would -- like, he would call Brent a baby, and he was</p> <p>7 still on breast milk. And so when I would talk to him</p> <p>8 side-bar or on the outside of the office, just he and I,</p> <p>9 saying can you please not address staff inappropriately,</p> <p>10 he then will retaliate and say things, you know,</p> <p>11 publicly, or openly in a group setting about me or</p> <p>12 something like that.</p> <p>13 Q. So other than -- other than Mr. Paul saying</p> <p>14 that you weren't a good manager, can you think of any</p> <p>15 other specific comments that -- that you -- that you</p> <p>16 heard, either from him or from staff telling you that he</p> <p>17 said?</p> <p>18 A. I report -- I -- I reported them to HR. I</p> <p>19 reported them to Ann Jobe, his -- his manager. And</p> <p>20 seeming that when I reported them to his manager, things</p> <p>21 had gotten worse.</p> <p>22 Q. And when you -- when you reported them to his</p> <p>23 manager and to HR, do you feel like ECFMG listened</p> <p>24 and -- and looked into what -- what you were saying?</p> <p>25 A. At first, I thought they did. And then at a</p>	
16:30	<p>10 A. I choose not to repeat those things. I can't</p> <p>11 even recall a lot of the stuff. I know he called me a</p> <p>12 witch.</p> <p>13 Q. Anything else?</p>	<p>10 he then will retaliate and say things, you know,</p> <p>11 publicly, or openly in a group setting about me or</p> <p>12 something like that.</p> <p>13 Q. So other than -- other than Mr. Paul saying</p> <p>14 that you weren't a good manager, can you think of any</p> <p>15 other specific comments that -- that you -- that you</p> <p>16 heard, either from him or from staff telling you that he</p> <p>17 said?</p> <p>18 A. I report -- I -- I reported them to HR. I</p> <p>19 reported them to Ann Jobe, his -- his manager. And</p> <p>20 seeming that when I reported them to his manager, things</p> <p>21 had gotten worse.</p> <p>22 Q. And when you -- when you reported them to his</p> <p>23 manager and to HR, do you feel like ECFMG listened</p> <p>24 and -- and looked into what -- what you were saying?</p> <p>25 A. At first, I thought they did. And then at a</p>	
16:30	<p>14 A. I think it's in my -- he -- he was telling my</p> <p>15 staff that I wasn't a good manager.</p> <p>16 Q. Who -- who told you that Mr. Paul said you</p> <p>17 weren't a good manager?</p>	<p>14 that you weren't a good manager, can you think of any</p> <p>15 other specific comments that -- that you -- that you</p> <p>16 heard, either from him or from staff telling you that he</p> <p>17 said?</p> <p>18 A. I report -- I -- I reported them to HR. I</p> <p>19 reported them to Ann Jobe, his -- his manager. And</p> <p>20 seeming that when I reported them to his manager, things</p> <p>21 had gotten worse.</p> <p>22 Q. And when you -- when you reported them to his</p> <p>23 manager and to HR, do you feel like ECFMG listened</p> <p>24 and -- and looked into what -- what you were saying?</p> <p>25 A. At first, I thought they did. And then at a</p>	
16:31	<p>18 A. David Strom.</p> <p>19 Q. How do you spell the last name?</p>	<p>18 A. I report -- I -- I reported them to HR. I</p> <p>19 reported them to Ann Jobe, his -- his manager. And</p> <p>20 seeming that when I reported them to his manager, things</p> <p>21 had gotten worse.</p> <p>22 Q. And when you -- when you reported them to his</p> <p>23 manager and to HR, do you feel like ECFMG listened</p> <p>24 and -- and looked into what -- what you were saying?</p> <p>25 A. At first, I thought they did. And then at a</p>	
16:31	<p>20 A. S T R O M.</p> <p>21 Q. M as in Mary?</p> <p>22 A. Yes.</p> <p>23 Q. And when did he tell you that Mr. Paul said</p> <p>24 that you weren't a good manager?</p>	<p>20 seeming that when I reported them to his manager, things</p> <p>21 had gotten worse.</p> <p>22 Q. And when you -- when you reported them to his</p> <p>23 manager and to HR, do you feel like ECFMG listened</p> <p>24 and -- and looked into what -- what you were saying?</p> <p>25 A. At first, I thought they did. And then at a</p>	
16:31	<p>24 that you weren't a good manager?</p> <p>25 A. I don't recall the -- the month and day.</p>	<p>24 and -- and looked into what -- what you were saying?</p> <p>25 A. At first, I thought they did. And then at a</p>	